

From: "Coffey, Scott" <CoffeySE@cdmsmith.com>
To: "Zhen, Davis" <Zhen.Davis@epa.gov>
"Sheldrake, Sean" <sheldrake.sean@epa.gov>
CC: younghs@cdmsmith.com
"Trump, Julee M." <trumpjm@cdmsmith.com>
"Greazel, Andrew" <GreazelAD@cdmsmith.com>
Date: 4/4/2018 3:55:38 PM
Subject: Health and Safety Addenda Associate Surface Water
Attachments: [HASP Addendum Surface Water_CLEAN_03.20.18_comments.pdf](#)

Davis and Sean.

As mentioned earlier today, we received the TSHA for Surface Water sampling back on March 21st. It came with two other TSHAs (Surface Sediment and Sediment Traps) that became the field efforts on a shorter fuse, so we focused on those first. Surface sediment TSHA was approved and we're waiting to hear from the Pre-RD Group on their response to EPA's review comments on the Sed. Trap TSHA/Dive Safety Plan.

Attached are review comments on the Surface Water Sampling TSHA. They are summarized below. We spent approximately (b) (4) on this review and comment set, including QC review to ensure consistency with previous TSHA comments. Let us know if you have any questions.

1. Page 2 – Supplemental List of Hazard Materials: Hexane is also listed in the SOP for decontaminating of SW sampling equipment. Include here and include SDS or specify that it is not planned for use. Liquinox is also an irritant, and an SDS is typically kept on site where it is used. Include here and include SDS, or include dilution specifications if concentrated Liquinox will not be kept on site.
2. Page 5 – Pre-JEA: Loading the boats into and out of the water using a boat trailer is an activity that must be included in the JHA.
3. Page 6 – Pre-JEA: Lifting hazards must be included under Activity 2 - load personnel and equipment onto vessel.
4. Page 6 – Pre-JEA Activity 2: Reference where the "appropriate rules and regulations" are in this document or other document.
5. Page 6 – Pre-JEA Activity 2: Rubber safety-toe boots must be worn for protection, exposure, and decontamination purposes. This change should be incorporated throughout this HASP addendum.
6. Page 7: Pre-JEA Activity 3, Water Hazards: Additional hazards include vessel colliding with submerged hazards (piling/rocks) and sudden stops and acceleration of the vessel should be evaluated. Control measures for these hazards must be added (e.g. chart review, visual observers, and pilot verbally announcing stops and starts).
7. Page 13: Pre-JEA Activity 6: Add broken glass as a potential sharps hazard w/ control measures including glass container handling/storage and broken glass cleanup.
8. Page 14: Pre-JEA Activity 8: Decontamination in the FSP calls for use of methanol and hexane. Please clarify their use throughout this HASP addendum and include safety measures planned for handling and storage of these materials.
9. Page 23: Gravity's Health and Safety and Environmental Plan: Suggest updating appendix references throughout document to reference applicable document/appendix/other such as an appendix to the programmatic HASP or FSP. Some appendix material may need to be added if not included in other documents. This comment is applicable for all HASP addendum attachments.
10. Page 29: Gravity's Health and Safety and Environmental Plan: If corrosive material use is proposed, include SDSs and specify where/when they will be used. If not, remove this section.
11. Page 34: Gravity's Health and Safety and Environmental Plan: Clarify the use of Type I, II, III or V PFDs. Gravity's plan calls for Type I or II but the Programmatic HASP calls for Type III or V.
12. Page 51: Gravity's Health and Safety and Environmental Plan: Include discussion and requirements for spill kits specific to hazardous materials in use at the site, including fuel, methanol, hexane and any other hazardous material/waste planned to be on site.
13. Page 52: Gravity's Health and Safety and Environmental Plan: Clarify that the Site location is Fred Devine Diving and Salvage at 6211 N Ensign St, Portland, OR 97217.
14. Page 59: Gravity's Health and Safety and Environmental Plan: Designate exclusion zone and contamination

14. reduction zone on the vessel diagrams.

From: Zhen, Davis [<mailto:Zhen.Davis@epa.gov>]
Sent: Tuesday, April 03, 2018 3:55 PM
To: Coffey, Scott <CoffeySE@cdmsmith.com>; Young, Howard S. <younghs@cdmsmith.com>
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Subject: FW: Health and Safety Addenda Associate Surface Water

Thanks,

Davis Zhen
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Davis,

I believe you asked for the Surface Water HASP Addendum.

Let me know if this answers your question.

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From: Tyrrell, Ken
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Subject: Health and Safety Addenda Associate w Field Sampling Plans

Davis,

Attached are the Health and Safety Plan (HASP) addenda that are associated with three of the Field Sampling Plans

(FSP s):

- Sediment trap FSP
- Surface sediment FSP
- Surface water FSP

As we've discussed, a kick-off meeting is scheduled in the sample processing facility in Portland. Invitations were sent to you, Scott Coffey and Howard Young. You will be receiving additional information soon that will include the agenda and other related information.

Ken Tyrrell

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